

SPEARS & IMES LLP

51 Madison Avenue
New York, NY 10010
tel 212 213-6996
fax 212 213-0849

David Spears
Tel 212-213-6991
dspears@spearsimes.com

November 9, 2018

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

Spears & Imes LLP, counsel for Defendants, respectfully submits this letter pursuant to Rule I.B.2 of the Court's Individual Rules and Procedures for Civil Cases on behalf of all parties to jointly request that the Court modify certain existing deadlines in this matter.

The parties request that the schedule for remaining briefing on Plaintiffs' Motion for Leave to Proceed Under Pseudonyms (ECF No. 30) be modified as follows: (1) the deadline for Defendants to submit an opposition to Plaintiffs' motion will be extended from November 13, 2018 until November 30, 2018; and (2) the deadline for Plaintiffs to submit a reply in support of their motion will be extended from November 20, 2018 until December 14, 2018.

The parties also request that the deadline for Defendants to answer or otherwise respond to the complaint be extended from November 20, 2018 until December 10, 2018. Should Defendants choose to submit a pre-motion letter for a motion to dismiss under Fed. R. Civ. P. 12(b) pursuant to Rule III.C.2 of the Court's Individual Rules, the parties request that the deadline for Plaintiffs to submit a responsive letter be set for December 21, 2018.

These are the parties' first requests to modify the briefing schedule on Plaintiffs' Motion for Leave to Proceed Under Pseudonyms and to extend the deadline for Defendants to answer or otherwise respond to the complaint.

Honorable Lorna G. Schofield

- 2 -

Respectfully submitted,

KAPLAN HECKER & FINK LLP

/s/ Roberta Kaplan

Roberta Kaplan

John Quinn

Joshua Matz

Alexander Rodney

Matthew Craig

EMERY CELLI BRINCKERHOFF &
ABADY LLP

/s/ Andrew Celli

Andrew Celli

Matthew Brinckerhoff

Katherine Rosenfeld

Andrew Wilson

Counsel for Plaintiffs

SPEARS & IMES LLP

/s/ David Spears

David Spears

Bradley Pollina

Cynthia Chen

Counsel for Defendants

cc: All counsel (via ECF)